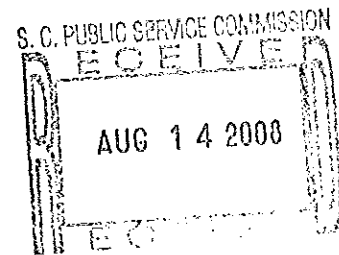


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RUSSELL W. RAY, P.L.L.C.

Attorney and Counselor at Law
6212-A Old Franconia Road
Alexandria, Virginia 22310



Russell W. Ray*
Holly R. Smith **

* Admitted in DC, VA
** Admitted in DC, PA, VA

Dir: (202) 302-3172
Tel: (703) 313-9401
Fax: (703) 313-8004
holly@raysmithlaw.com

COPY

Posted: led

Dept: S.A.

Date: 8/15/08

Time: 10:15

August 12, 2008

VIA FED EX

The Honorable Charles Terreni
Chief Clerk/Administrative
Public Service Commission of South Carolina
101 Executive Center Drive, Suite 100
Saluda Building
Columbia, SC 29211

RECEIVED

AUG 14 2008

PSC SC
DOCKETING DEPT.

RE: Progress Energy Carolinas, Inc.'s Application for the Establishment of Procedures to Encourage Investment in Energy Efficient Technologies; SCPSC Docket No. 2008-251-E

Dear Mr. Terreni:

Enclosed pursuant to SCCR 103-833 governing discovery, please find a copy of the First Set of Discovery Requests of Wal-Mart Stores East, LP to Progress Energy Carolinas, Inc.

Sincerely,

Holly R. Smith

Holly Rachel Smith
Counsel for Wal-Mart Stores East, LP

ENCLOSURE
ENCLOSURE
101 EXECUTIVE CENTER DRIVE, SUITE 100
SALUDA BUILDING
PUBLIC SERVICE COMMISSION OF SOUTH CAROLINA
COLUMBIA, SOUTH CAROLINA 29211
TEL: (803) 253-1234

**BEFORE
THE PUBLIC SERVICE COMMISSION OF
SOUTH CAROLINA
DOCKET NO. 2008-251-E**

In the Matter of)	
)	
Progress Energy Carolinas, Inc.'s Application)	FIRST SET OF
For the Establishment of Procedures to)	DISCOVERY
Encourage Investment in Energy Efficient)	REQUESTS OF
Technologies; Energy Conservation Programs;)	WAL-MART STORES
And Incentives and Cost Recovery for Such)	EAST, LP TO PROGRESS
Programs)	ENERGY CAROLINAS, INC.
)	
)	

Pursuant to SCCR 103-833, Wal-Mart Stores East, LP ("Wal-Mart") requests that Progress Energy Carolinas, Inc. ("Progress Energy") answer the interrogatories and produce the documents as indicated below within twenty (20) calendar days of receipt of this request for production and all other discovery requests to which the following request applies.

The Company is requested to provide one copy of all responses to this request to the undersigned counsel and also to:

Steve Chriss
Wal-Mart Stores East, LP
2001 SE 10th St.
Bentonville, AR 72716-0550
stephen.chriss@wal-mart.com

Also, with respect to all calculation provided in response to a discovery request, please provide the electronic format with all formulae and links intact.

A copy of this request has been sent to the Chief Clerk of the Public Service Commission of South Carolina.

First Set of Discovery Requests

REQUEST 1-1:

Please provide a copy of all discovery responses, including all attachments, which you have served or hereafter serve on other parties to this docket, in the same form in which you served such responses.

REQUEST 1-2:

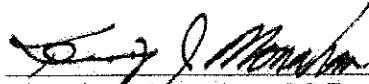
Please provide electronic copies, in Microsoft Excel format with all formulae and links intact, of all workpapers and exhibits.

Dated this 12th day of August, 2008.

Respectfully submitted,



Holly Rachel Smith
Russell W. Ray, PLLC
6212-A Old Franconia Road
Alexandria, VA 22310
Telephone: (202) 302-3172
Facsimile: (703) 313-8004
E-Mail: holly@raysmithlaw.com



Timothy J. Monahan, SC Bar No. 65659
Monahan & Moses, LLC
13-B W. Washington St.
Greenville, SC 29601
Telephone: (864) 241-4604
Facsimile: (864) 241-4606

Attorneys for WAL-MART STORES EAST, LP